

**EXHIBIT B**

Time and Expense Invoice

**RANDI ELLIS, LLC**  
**ATTORNEY AT LAW\***  
 (A LIMITED LIABILITY COMPANY)

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\*LICENSED IN LOUISIANA AND TEXAS

United States Bankruptcy Court  
 District of New Jersey  
 402 East State Street  
 Trenton, NJ 08608

June 14, 2022  
 Client: 001000  
 Matter: 000001  
 Invoice #: 8  
 Resp. Atty: LMW  
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RE: In Re: LTL Management, LLC  
 Case No.: 21-30589  
 Judge: Michael B. Kaplan  
 Chapter: 11

For Professional Services Rendered Through May 31, 2022

**SERVICES**

Date	TMK	Task	Description of Services	Hours	Rate	Amount
5/1/2022	RE	B200	Review and analyze filings from 4/28 and 4/29 (1.2); Prepare for hearing with Judge Kaplan regarding discovery requests sent to Debtor (.3).	1.5	\$950.00	\$1,425.00
5/2/2022	RE	B200	Zoom call with potential experts to discuss conflicts, timeline, scope of work (.6); Follow up emails regarding same (.3); Attending Court call regarding debtor's answers to discovery (.5).	1.4	\$950.00	\$1,330.00
5/2/2022	RE	B195	Travel Houston to Philadelphia to attend meeting with mediators and attending 5/4/2022 Court Hearing.	7.0	\$475.00	\$3,325.00
5/3/2022	RE	B200	Meeting with mediators (4.0); Follow up communications with potential experts (.5); Review of filings in preparation for May 4 hearing (2.8).	7.3	\$950.00	\$6,935.00
5/4/2022	RE	B140	Attending May 4, 2022 Omnibus Hearing (5.0); Meeting with mediators before the hearing (1.5); Meeting with counsel after the hearing to discuss pending matters and mediation strategy (3.2).	9.7	\$950.00	\$9,215.00
5/5/2022	RE	B200	Meetings with counsel to discuss and interview potential experts and strategy for mediation (5.3); Review of additional materials from potential expert and additional due diligence regarding same (2.2).	7.5	\$950.00	\$7,125.00

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**SERVICES**

Date	TMK	Task	Description of Services	Hours	Rate	Amount
5/6/2022	RE	B200	Preparing for and attending Zoom with potential expert (2.5); Review of reports and filings in preparation for mediation set for next week (1.6); Communications with mediators (.4).	4.5	\$950.00	\$4,275.00
5/8/2022	RE	B200	Preparing for mediation, review of facts and findings, pending motions, court rulings, and filed reports (4.3).	4.3	\$950.00	\$4,085.00
5/9/2022	RE	B200	Communications with potential experts and additional due diligence regarding same (1.5); Preparing for mediation (2.0); Meeting with counsel before attending mediation (1.3); Attending mediation (5.0).	9.8	\$950.00	\$9,310.00
5/10/2022	RE	B200	Preparing for mediation (1.5); Attending mediation (7.0); Meeting with counsel after mediation (4.0).	12.5	\$950.00	\$11,875.00
5/11/2022	RE	B200	Attending mediation (9.0) and Meeting with counsel before and after mediation (2.5).	11.5	\$950.00	\$10,925.00
5/12/2022	RE	B195	Travel Time return home from mediation.	6.0	\$475.00	\$2,850.00
5/12/2022	RE	B200	Correspondences with counsel regarding experts (.4); Communications with mediators (.5).	0.9	\$950.00	\$855.00
5/13/2022	RE	B200	Communications with mediators (.6); Research and review of filings regarding plan proposals, strategy and review of facts (2.5).	3.1	\$950.00	\$2,945.00
5/14/2022	RE	B200	Review correspondences with potential expert (.3); Research trust plans and FCR duties (2.5).	2.8	\$950.00	\$2,660.00
5/14/2022	RE	B200	Research regarding future claims modeling estimating aggregate liabilities.	2.8	\$950.00	\$2,660.00
5/16/2022	RE	B200	Review of certifications filed regarding monthly statement (.2); Review of Amended Order Establishing Mediation Protocol (.2); Communications with mediators and counsel in preparation of mediation set for May 23 (.4); Review of case facts and strategize same (1.5).	2.3	\$950.00	\$2,185.00
5/17/2022	RE	B200	Review of draft certification for retention of expert (.3); Review of prior bankruptcy trust agreements and TDPs and communications with counsel regarding same (2.3); Review of pleadings filed by US Trustee to Compel Compliance with Rule 2019; Responses to same by AWOK and Arnold & Itkin (.5); Communications with counsel regarding next steps (.3).	3.4	\$950.00	\$3,230.00

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**SERVICES**

Date	TMK	Task	Description of Services	Hours	Rate	Amount
5/18/2022	RE	B200	Review of revised versions of certification documents and exhibits (.5); Review of public trust agreements and TDP from prior bankruptcies (1.8).	2.3	\$950.00	\$2,185.00
5/19/2022	RE	B200	Attending zoom call with TCC and counsel (.8); Review of draft correspondence, revisions, and filings regarding potential expert (.6).	1.4	\$950.00	\$1,330.00
5/19/2022	RE	B200	Review of revisions of retention application and certification (.4); Review of EFC No. 2319 Letter to J. Kaplan and exhibits regarding retained professionals (.2); Communications with counsel regarding strategy (.3).	0.9	\$950.00	\$855.00
5/20/2022	RE	B200	Final review of executed documents and proposed order regarding certification in support of retention application and communications with counsel (.8); Review of ECF 2324 Trustee's Objection to Debtor's Retention of Special Counsel (.3); Review of filings regarding debtor's objection to motion to compel Rule 2019 (.2).	1.3	\$950.00	\$1,235.00
5/21/2022	RE	B200	Review of agenda and pleadings to prepare for May 24 court hearings.	2.2	\$950.00	\$2,090.00
5/22/2022	RE	B195	Travel Time from Houston to attend mediation in Trenton on May 23, 2022.	7.0	\$475.00	\$3,325.00
5/22/2022	RE	B200	Meeting with counsel to prepare for mediation and hearings.	3.5	\$950.00	\$3,325.00
5/23/2022	RE	B200	Meeting with counsel (.6); Attending mediation in Trenton (7.0); Meeting with mediators (1.5).	9.1	\$950.00	\$8,645.00
5/24/2022	RE	B140	Attending May 24, 2022 Court hearing (3.0); Meeting with mediators and counsel (.5); Meeting with counsel to strategize and review facts (2.3).	5.8	\$950.00	\$5,510.00
5/24/2022	RE	B195	Travel Time return from attending court hearing to Houston.	6.5	\$475.00	\$3,087.50
5/25/2022	RE	B200	Communications with counsel regarding filings for retention of expert (.7); Communications with potential expert regarding review facts and data (1.3); Review of filings regarding expert (.4); Communications with mediators regarding next steps (.3); Review of article regarding bankruptcy process with respect to mass torts and analyze same (1.5).	4.2	\$950.00	\$3,990.00

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**SERVICES**

Date	TMK	Task	Description of Services	Hours	Rate	Amount
5/26/2022	RE	B200	Communications with counsel regarding expert (1.4); Review of filings for expert (.4); Analyze FCR articles regarding due process and mass torts (1.8); Communications with expert regarding facts and status of retention (.5); Review of proposed agreement (.2).	4.3	\$950.00	\$4,085.00
5/27/2022	RE	B200	Communications with counsel regarding potential experts (1.5); Communications with potential experts (1.8); Research on conflicts and objections in bankruptcy court (2.5).	5.8	\$950.00	\$5,510.00
5/28/2022	RE	B200	Research and communications with potential experts (3.8); Communications with counsel regarding potential experts (.5); Communications with mediators regarding update and next steps (.6).	4.9	\$950.00	\$4,655.00
5/29/2022	RE	B200	Communications with counsel regarding potential experts, setting meetings (.4); Research regarding future claims forecasting and reports (1.5); Due diligence regarding FCR duties and strategy for next steps (2.8).	4.7	\$950.00	\$4,465.00
5/30/2022	RE	B200	Research and review of prior bankruptcy trust agreements and TDPs (3.5); Analyze facts (1.5).	5.0	\$950.00	\$4,750.00
5/31/2022	RE	B200	Communications with counsel regarding potential experts (.6); Preparing for call with potential experts (.3); Attending zoom call with potential experts and counsel (.5); Call with counsel regarding potential experts (1.0); Communications with potential experts (1.4); Communications with other experts regarding potential experts (.6).	4.4	\$950.00	\$4,180.00
Total Professional Services				171.6		\$150,432.50

**PERSON RECAP**

Person		Hours	Rate	Amount
RE	Randi Ellis	26.5	\$475.00	\$12,587.50
RE	Randi Ellis	145.1	\$950.00	\$137,845.00

**EXPENSES**

Date	Task	Description of Expenses	Amount
5/5/2022	E100 - E110	Randi S. Ellis- Airfare - May 2, 2022 and May 12, 2022 to attend May 4 hearing and May 9-11 Mediation Sessions NYC	\$884.20

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**EXPENSES**

Date	Task	Description of Expenses	Amount
5/5/2022	E100 - E110	Randi S. Ellis- Uber - Newark to NYC for meditations	\$59.88
5/12/2022	E100 - E110	Randi S. Ellis- Uber - NYC hotel to Newark airport return after Mediations May 9-11, 2022	\$94.92
5/18/2022	E100 - E110	Randi S. Ellis- Airfare - Houston to Newark 05/22-24/2022	\$567.20
5/22/2022	E100 - E110	Randi S. Ellis- Alto - Transportation to Airport for May 23 mediation and May 24 hearing in Trenton, NJ	\$98.24
5/22/2022	E100 - E110	Randi S. Ellis- Hotel - 05/22 -05/24/2022	\$539.21
5/24/2022	E100 - E110	Randi S. Ellis- Alto - Transportation Return from Mediation and Hearing	\$113.39
5/25/2022	E100 - E110	Randi S. Ellis- Airfare - Houston to Newark 06/13-14/2022	\$717.20
Total Expenses			\$3,074.24
Total Services			\$150,432.50
Total Disbursements			\$3,074.24
Total Current Charges			\$153,506.74
Previous Balance			\$230,254.92
<i>Less Payments</i>			(\$185,006.42)
<b>PAY THIS AMOUNT</b>			<b>\$198,755.24</b>

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Due Upon Receipt. Please include the invoice number on all remittance. Thank you.

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### TASK RECAP

<b>Services</b>		<b>Disbursements</b>		
<b>Category</b>	<b>Hours</b>	<b>Category</b>	<b>Amount</b>	
B140	15.50	\$14,725.00	E100 - E110	\$3,074.24
B195	26.50	\$12,587.50		\$0.00
B200	129.60	\$123,120.00		\$0.00
	<hr/> <u>171.60</u>	<hr/> <u>\$150,432.50</u>	<hr/> <u>\$3,074.24</u>	